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April 17, 2020

**VIA ECF**

Honorable Judge Ronnie Abrams  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, New York 10007

Re: *Jon R. Morgan v. Cybercartel International, Inc.*, Case No. 1:19-cv-10684-RA

Dear Hon. Judge Abrams,

As the Court is aware, the undersigned represents the Plaintiff in the above-referenced case. A complaint against the above-named Defendant was filed on November 18, 2019. The summons against said Defendant was issued on November 19, 2019. Said summons and complaint were successfully served on February 11, 2020, filed on February 12, 2020, and Defendant's time to respond was due by March 3, 2020.

As of today, Defendant has failed to respond, therefore the undersigned is requesting from the Court to move for default.

No later than May 29, 2020, Plaintiff shall move for default judgment in accordance with Federal Rule of Civil Procedure 55(b)(2) and Local Civil Rule 55.2(b), as well as this Court's Individual Rules & Practices, including this Court's Emergency Individual Rules & Practices in Light of COVID-19, available at <https://nysd.uscourts.gov/hon-ronnie-abrams>. Plaintiff is advised that before moving for default judgment, he must first obtain a Clerk's Certificate of Default.

Respectfully submitted,

/s/ Jonathan Shalom  
Jonathan Shalom, Esq.  
Attorney for Plaintiff

SO ORDERED.

A handwritten signature in blue ink, appearing to be "R. Abrams", written over a horizontal line.

Hon. Ronnie Abrams

4/20/2020